



May 16, 2006

**Via Overnight Mail**

Ms. Linda Mangrum  
U.S. Environmental Protection Agency  
Remedial Enforcement Support Section  
77 West Jackson Boulevard, SR-6J  
Chicago, IL 60604-3590

**Re: USS Lead Site, East Chicago, Indiana - Requests for Information**

Dear Ms. Mangrum:

This letter is the response of Legacy Site Services LLC ("LSS"), which as of April 1, 2006 is the exclusive agent of Arkema Inc. (successor to ATOFINA Chemicals, Inc. and M&T Chemicals, Inc.) for certain remediation sites. LSS received two United States Environmental Protection Agency ("USEPA") Requests for Information dated March 21, 2006 and received March 29, 2006 regarding the USS Lead Site in East Chicago, Indiana. One was addressed to "Arekma (sic) fka American Can Corporation," and the other was addressed to "Arekma (sic) fka U S Reduction." LSS received an extension of time to respond until May 26, 2006. Please note that Arkema responded to a previous USEPA request for the USS Lead Site, regarding its predecessor M&T Chemicals, Inc. LSS refers USEPA to Arkema's response addressed to you dated October 18, 2005 with attached documents.

The following is meant to clarify the corporate history of the facility at 415 E. 151<sup>st</sup> Street, East Chicago, Indiana. In July 1911, the Goldschmidt Company purchased the East Chicago tract of land and construction began on the plant. In 1918, Goldschmidt became Metals and Thermit Corporation. In 1962, Metals and Thermit merged into American Can Company and spun off as a wholly-owned subsidiary under the new name of M&T Chemicals, Inc. ("M&T"). In August 1977, American Can Company, the parent of M&T, sold M&T. Prior to the sale, American Can Company spun the metals recovery division of M&T into MRI Corporation. As of August 1977, both M&T and MRI operated at the 415 E. 151<sup>st</sup> Street, East Chicago, Indiana facility. M&T continued producing electroplating chemicals, and MRI continued the metals recovery business. M&T ceased operations at East Chicago in November 1981. American Can Company and its successors remain liable for costs relating to metals recovery. After a reasonable and diligent search, no documents relating to the metals recovery process were found. It is believed that such documents were transferred to MRI in 1977. Based on a review of its records, neither Arkema nor its predecessors (including M&T) has had any corporate